REMARKS

In response to the Office Action mailed September 14, 2006, favorable reconsideration is respectfully requested in view of the above amendments and the following remarks. Claims 1-15, 17-28, and 31-33 are pending as of the mailing date of the instant office action.

Applicants respectfully submit that the FIG. 1 has been amended to show an exemplary workflow process 10, exemplary forms 445, and an exemplary business logic editor 135, all of which are discussed in the original specification. Applicants respectfully submit that the FIG. 1 has been amended to show block 455 has been renumbered to 452. This corrects the numbering error in which 455 is used to designate two separate features of the present invention.

Applicants respectfully submit that the FIG. 7 has been amended as suggested by the Examiner so that it is no longer too dark and it is clear that the drawing shows an exemplary action object icon that may access the exemplary data file shown in FIG. 6. As amended, FIG. 7 should no longer be objectionable. Applicants respectfully request that an indication that the drawings are acceptable be given.

The specification has been amended for purposes of accuracy, including amendments as requested by the Examiner and also including several corrections of informalities. No new subject matter has been added by the present amendment.

Claims 1-30 are rejected under 35 U.S.C. Sec. 102(b) as being anticipated by U.S. Patent No. 5,999,911 to Berg et al., hereinafter referred to as the "Berg reference." This rejection is respectfully traversed.

The Berg reference is directed to a workflow manager system that provides computer-assisted, graphical tools for defining and managing the electronic design automation (EDA) for the development of complex electronics (e.g. designing an electronic circuit). The Berg system addresses the problem that computer-based design tools that tend to be single user tools that are incompatible with each other, but complex design processes generally require multiple steps, multiple designers, and a large amount of data. The Berg system enables a user (the flow designer using a graphical flow builder 80) to define a process, such as an electronic circuit design process, in terms of a workflow. The workflow definition includes a description of the steps in the process, the dependency relationship among steps, and the work to be performed by each step in terms of a step encapsulation. At column 8, line 65-column 15-line 3, the Berg

reference describes a user creating a workflow definition (including graphical representations and dependency relationships) or "template," working copies (instances) of which are available to designers. The Berg system is specifically designed to decentralize the processing and design over a Local Area Network (LAN) such as that shown in FIG. 2. The LAN includes a plurality of computers systems (FIG. 1) that act as nodes on the LAN. Workflow manager programs execute on the individual nodes to open the instances (working copies) of the workflow template. The purpose of the Berg system is to allow processing and design to take place on the nodes of the LAN. While one or more users perform a design process, the workflow manager system manages the process according to a workflow definition. In other words, the Berg system decentralizes processing and design, while providing a method for management of such decentralized processing and design.

Although the Berg reference uses terminology similar to that found in applicants' application, the Berg reference is completely different and does not teach or suggest applicants' invention. These differences include, but are not limited to the following three examples:

- The present invention is directed to a method, system, and apparatus for creating a workflow process. Although the Berg system describes a user defining and storing a model of a process using a graphical flow builder (or other program), there is no teaching or suggestion of a centralized system that allows users, some of whom have no previous computer programming or computer developing skills, to create a custom workflow process.
- The present invention is a centralized system that users access. The Berg system is a decentralized system that allows designers to run working copies (instances) of a workflow template so that they can process and design electronic circuits on their own nodes of a LAN. The Berg reference provides no teaching or suggestion of allowing access to a centralized master center via a thin client application or via web services.
- The present invention does not require users to have specialized hardware or software to participate in the creation of the workflow. The Berg system requires special programs. For example, a graphical flow builder is required for the user to define and store a model of a process. Another example is a

workflow manager program is required to allow designers to run an instance of a workflow template on their own nodes of a LAN. The Berg reference provides no teaching or suggestion that users can access a custom workflow process via a thin client application.

The Examiner's rejections primarily focus on the portion of the Berg reference that is directed to a user defining and storing a model of a process using a graphical flow builder (columns 8-10). However, the Examiner also relies on other sections of the Berg reference and the figures of the Berg reference unrelated to the graphical flow builder to find support for claimed elements of applicants' invention. For example, the Examiner appears to suggest that Berg figure 2 teaches a user accessing the manager over a network connection and that this teaches that the claimed business logic editor is a thin client application (see the Examiner's rejection of claim 16). At the very most, Berg figure 2 teaches that individual nodes (computer systems) are connected together, but the Berg reference teaches away from thin client applications.

Applicants have amended claims to specifically recite features of the present invention. Applicants have made these amendments for the purpose of furthering prosecution, but reserve the right to file continuation applications. Based on these amendments, applicants respectfully submit that the pending claims are now in condition for allowance.

Turning to the claims themselves, the majority of the pending claims now specify the use of a thin client application in the process of defining a workflow process. As set forth above, the Berg reference does not teach or suggest the use of a thin client application. In fact, the Berg reference teaches away from the use of a thin client application because, for example, it requires specific software to be loaded onto individual nodes of the LAN in order to access working copies of a template. Accordingly, applicants respectfully submit that the currently pending claims that specifically include the "thin client" feature are allowable over the Berg reference.

Claims 1 and 26 are specifically directed to a method and system for defining a workflow process. This is well beyond the scope of the Berg reference. In the rejection of these claims, the Examiner focuses on the Berg flow builder 80 that is described in FIGS. 9 and 10. The Berg flow builder does not have the capacity to collect a plurality of data, defining at least one data record based on said plurality of data, allocating said at least one defined data record to at least one data file, and organizing said at least one data file into at least one form. The

sections of the Berg reference cited by the Examiner have to do with higher functions that relate to building the workflow, not defining it. The flow builder 80 is trying to describe a complex electrical circuit. Applicants respectfully submit that claims 1 and 26, and the claims depending directly or indirectly from these claims, are allowable over the Berg reference. Applicants respectfully request elaboration of this rejection if it is to be maintained.

Claims 12-14, 17, 20, 23-25, 28, and new claim 33 (as well as claims depending therefrom), are related to the accessibility of the system of the present invention via a web service. Open access to the workflow functionality via industry standard web services interface is one of the unique features of applicants' invention. For example, the ability to execute a workflow process via web services (see claims 20 and 28) enables the user interface software to execute the workflow from different machines, written in different languages and different run-time embodiments. Applicants believe that the Berg reference is limited to a LAN implementation that would not allow the remote execution of workflow from any computer that is not specifically connected to the LAN. As another example, claim 14 is directed to the feature of the present invention that allows a system analyst to independently develop a web based user interface in a programming language that is different from a programming language used to program the data records, the data files, and components of the master center. (See the paragraph spanning pages 12 and 13 of applicants' original application or paragraph 0054 of the published application). The Berg system simply does not give a user the ability to independently develop a web based user interface. Nor does the Berg reference teach or suggest such a feature as it is well beyond the scope of its system. Applicants respectfully submit that claims 12-14, 17, 20, 23-25, 28, and 33, and the claims depending directly or indirectly from these claims, are allowable over the Berg reference. Applicants respectfully request elaboration of this rejection if it is to be maintained.

New claims 31 and 32 include steps or means to both define a workflow process and to create a workflow process. These claims incorporate subject matter from the original claims (e.g. claims 1 and 15) as well as from the original specification. No new matter has been added. The ability to both define and create a workflow process allows the complete customization of the workflow process. For example, the Berg reference flow builder does not have the ability to define the workflow process, but must use predefined task steps, activity steps, decision steps, and subflow steps (although the attributes of these steps can be customized). The

inventions set forth in claims 31 and 32, however, allow the user to define a data record based on any collected data, allocate the data records into data files, organize the data files into forms, and then associate the forms with graphical action object icons. This can all be done by the business logic editor without the need for any coding (instead relying on interface data selection techniques such as drop down menus), thus allowing a user having no previous computer programming or computer developing skills to develop a customizable workflow process. Applicants respectfully submit that these claims are allowable over the known prior art.

Applicants have chosen not to present arguments specific to each of the pending claims, but reserve the right to present such arguments in future communications.

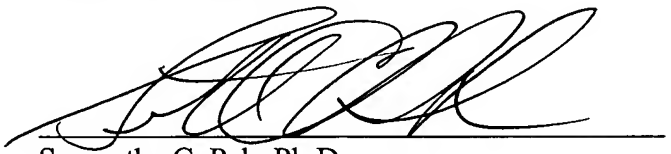
CONCLUSION

Reconsideration of the claims is respectfully requested in view of the above amendments and remarks. In the event that there are any questions concerning this response, or the application in general, the Examiner is respectfully urged to telephone the undersigned attorney so that prosecution of the application may be expedited.

A Petition for Extension of Time for one month is enclosed herewith.

Please charge Deposit Account No. 13-3571 for any additional fees which may be required.

Respectfully submitted,



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